

# EXHIBIT A

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

## IN RE TEZOS SECURITIES LITIGATION

Master File No. 17-cv-06779-RS

## CLASS ACTION

**DECLARATION OF ARMAN ANVARI IN  
SUPPORT OF MOTION TO WITHDRAW  
AS LEAD PLAINTIFF**

This document relates to:

## ALL ACTIONS

Date: March 7, 2019  
Time: 1:30 p.m.  
Crtrm: 3

Judge: Hon. Richard Seeborg

1 I, Arman Anvari, declare as follows pursuant to 28 U.S.C. § 1746:

2 1. On March 6, 2018, the Court appointed me as the Lead Plaintiff in this action, and my  
 3 attorneys as the Co-Lead Counsel. Dkt. No. 101.

4 2. Since my appointment as Lead Plaintiff, I have actively participated in the litigation  
 5 of this lawsuit, including:

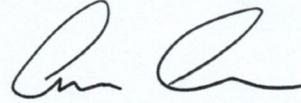
- 6 • reviewing, commenting on and revising drafts of the Consolidated Class Action  
 7 Complaint filed on April 3, 2018 (Dkt. No. 108);
- 8 • reviewing the motions to dismiss filed by the Defendants (Dkt. Nos. 117, 119, 123,  
 9 126), and commenting on and revising drafts of the opposition briefs filed by my  
 attorneys in response to each of those motions to dismiss (Dkt. Nos. 132-135);
- 10 • engaging in substantial discovery efforts, including searching for and producing  
 11 documents to Defendants in response to their document requests, and providing  
 12 other discovery such as written responses to interrogatories and requests for  
 admissions served by Defendants;
- 13 • numerous and regular meetings/communications in person and via telephone and  
 14 email with my attorneys;
- 15 • involving myself in the one-day mediation between the parties that was conducted  
 16 on December 14, 2018 by reviewing and commenting on the written mediation  
 submissions and providing instructions to my attorneys during the mediation;
- 17 • approving the addition of named plaintiffs Pumaro LLC (“Pumaro”) and Artiom  
 18 Frunze to this lawsuit (Dkt. Nos. 183 and 186);
- 19 • causing the filing of the Motion for Class Certification on January 9, 2019 (Dkt.  
 20 No. 187), which seeks the appointment of Mr. Frunze and Pumaro as Class  
 Representatives; and
- 21 • providing input into the strategy and direction of this case generally.

22 3. Based on various legal arguments which Defendants intend to make, however, I  
 23 believe I will not be able to adequately represent the putative Class, and have instructed my attorneys  
 24 to seek my withdrawal as Lead Plaintiff. I believe that Pumaro and Mr. Frunze, if appointed as Class  
 25 Representatives, will capably represent the interests of the Class.

26 4. Until my withdrawal, I will continue to comply with my responsibilities as Lead  
 27 Plaintiff, including agreeing to make myself available for a deposition, as Defendants have requested.

1 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
2 knowledge.

3 Executed this 27<sup>th</sup> day of January, 2019 in Chicago, Illinois.

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6 Arman Anvari  
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